



**Georgia-Pacific**

1070005

Palatka Pulp and Paper Operations  
Consumer Products Division

P.O. Box 919  
Palatka, FL 32178-0919  
(386) 325-2001

May 6, 2002

RECEIVED

MAY 10 2002

BUREAU OF AIR REGULATION

Ms. Cindy Phillips, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: CAA Section 112 (j) Part 1 Application

Dear Ms. Phillips:

Enclosed is Georgia-Pacific Corporation's Part 1 application for a case-by case MACT determination pursuant to section 112 (j) of the federal Clean Air Act and EPA's April 5, 2002 amendment to the section 112 (j) rules. 67 Fed. Reg.16582(Apr. 5, 2002). According to the April 5 rule amendment, Part 1 applications are due to the Title V permitting authority on May 15, 2002, and Part II applications will be due, if necessary, 24 months later.

Georgia-Pacific has reviewed the MACT source category descriptions most recently published on February 12, 2002 (67 Fed. Reg. 6521), as supplemented by the applicability criteria posted by EPA to its website as of March 12, 2002. As directed in the preamble to the above-referenced April 5 rule amendment, Georgia-Pacific has also reviewed any available MACT rule proposals, any additional information available on the Air Toxics Website, and has made direct contact with EPA project leads. Based on this information, Georgia-Pacific believes at this time that this facility may be subject to the forthcoming MACT rules for the categories indicated on the attached form. Due to the stated preliminary nature of some of the available guidance, Georgia-Pacific is, in some instances, submitting its application at this time purely as a precautionary measure to avoid any questions about timeliness for section 112 (j) purposes and to secure an application shield under the Title V rules. New information may arise or more specific applicability criteria may be issued which show that this facility is or is not regulated

under one or more of these categories. We reserve the right to revise or withdraw this application at any time before the Part II application deadline.

Sincerely,



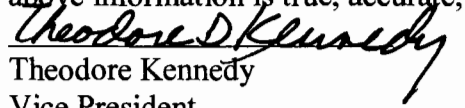
Theodore D. Kennedy  
Vice-President  
Georgia-Pacific Palatka Operations

Cc: Mr. Doug Neeley  
U.S. EPA Region IV  
Air, Pesticides, and Toxics Management Division  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

**Part 1 Application for Case-by-Case MACT Determination  
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

1. **Company Name:** Georgia-Pacific Corporation
2. **Mailing Address:** County Road 216  
Palatka, FL 32178
3. **Name of Major Source:** Georgia-Pacific Palatka Operations
4. **Location of Major Source:** Palatka, FL
5. **Description of Major Source:** Pulp & Paper Mill
6. **Applicable Section 112 Source Category:** See Attachment.
7. **Types of sources belonging to the relevant source category present at the major source:** See Attachment.
8. **Affected sources at the major source for which a section 112(g) MACT determination has been made:** N/A
- 
9. **Pursuant to 40 CFR 63.52(e)(2)(ii), this source requests a determination that the section 112(g) MACT determination made for the above referenced affected source(s) is substantially as effective as the emission limitations which would otherwise be adopted pursuant to section 112(j) for the source(s) in question.**  
 Yes     No
10. **Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), this source requests Florida Department of Environmental Protection to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part: (Identify the emissions units and the source category for which an applicability determination is requested.)** N/A
- 

I certify, based on information and belief, formed after a reasonable inquiry that the above information is true, accurate, and complete.

  
Theodore Kennedy  
Vice President  
Georgia-Pacific Palatka Operations

5/7/02  
Date

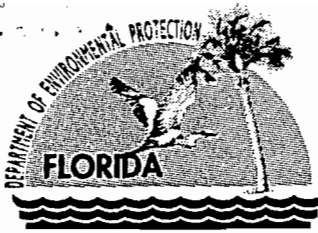
**Attachment**  
**Applicable Section 112 Source Category(ies)**  
**Part 1 Application for Case-by-Case MACT Determination**  
**Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56**

**Instructions:** Review all of the categories below. Check the box next to those categories for which the facility can reasonably determine that one or more sources at the major source belong in the category. For those checked categories, list the types of sources belonging to the relevant source category. The listing of the types of sources in the category does not require a detailed listing of the emissions units at the facility but rather a more general statement regarding the types of units that will be regulated under the particular category. NOTE: This list is based on several EPA publications regarding source categories that would be subject to Section 112(j) as of March 6, 2002. Please ensure that you consult EPA's website for the most current listing of Section 112(j) subject source categories prior to filing the Part 1 Application. EPA's website is located at [www.epa.gov/ttn](http://www.epa.gov/ttn). You can obtain more information regarding the scope of the source categories listed below on EPA's website, [http://www.epa.gov/ttn/atw/112j/info/112\(j\)-table2.html](http://www.epa.gov/ttn/atw/112j/info/112(j)-table2.html). EPA is expected to issue a list of categories for which Part 1 Applications will be required close to May 15, 2002. That list should be consulted and compared with the list below to determine if any categories have been added to or removed from the list.

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Combustion Turbines	<input type="checkbox"/>	
Engine Test Facilities and Rocket Testing Facilities	<input type="checkbox"/>	
Boilers and Process Heaters <ul style="list-style-type: none"> <li>▪ Industrial Boilers</li> <li>▪ Institutional/Commercial Boilers</li> <li>▪ Process Heaters</li> </ul>	<input checked="" type="checkbox"/>	Boilers
Lightweight Aggregate	<input type="checkbox"/>	
Reciprocating Internal Combustion Engines	<input type="checkbox"/>	
Primary Copper Smelting	<input type="checkbox"/>	
Primary Magnesium Refining	<input type="checkbox"/>	
Coke Ovens: Pushing, Quenching and Battery Stacks	<input type="checkbox"/>	
Integrated Iron and Steel Manufacturing	<input type="checkbox"/>	
Iron Foundries	<input type="checkbox"/>	
Steel Foundries	<input type="checkbox"/>	
Asphalt Roofing Manufacturing and Asphalt Processing	<input type="checkbox"/>	
Asphalt/Coal Tar Application to Metal Pipes (subsumed with Misc. Metal Parts & Products)	<input type="checkbox"/>	
Brick and Structural Clay Products Manufacturing/Clay Minerals Processing	<input type="checkbox"/>	
Lime Manufacturing	<input type="checkbox"/>	
Refractories Manufacturing (formerly Chromium Refractories)	<input type="checkbox"/>	

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Taconite Iron Ore Processing	<input type="checkbox"/>	
Organic Liquids Distribution (Non- Gasoline)	<input type="checkbox"/>	
Auto and Light Duty Truck (Surface Coating).	<input type="checkbox"/>	
Large Appliance (Surface Coating)	<input type="checkbox"/>	
Metal Can (Surface Coating)	<input type="checkbox"/>	
Metal Coil (Surface Coating)	<input type="checkbox"/>	
Metal Furniture (Surface Coating)	<input type="checkbox"/>	
Miscellaneous Metal Parts and Products (Surface Coating)	<input type="checkbox"/>	
Paper and Other Webs (Surface Coating).	<input type="checkbox"/>	
Plastic Parts and Products (Surface Coating)	<input type="checkbox"/>	
Printing, Coating, and Dyeing of Fabrics.	<input type="checkbox"/>	
Wood Building Products (Surface Coating) (formerly Flat Wood Paneling)	<input type="checkbox"/>	
Municipal Solid Waste Landfills	<input type="checkbox"/>	
Site Remediation	<input type="checkbox"/>	
Vegetable Oil Production	<input type="checkbox"/>	
Cellulose Production Manufacturing <ul style="list-style-type: none"> <li>▪ Cellulose Ethers Production</li> <li>▪ Caroxymethylcellulose Production</li> <li>▪ Cellulose Ethers Production</li> <li>▪ Cellulose Food Casing Manufacturing</li> <li>▪ Cellophane Production</li> <li>▪ Methylcellulose Production</li> <li>▪ Rayon Production</li> </ul>	<input type="checkbox"/>	
Miscellaneous Organic NESHAP <ul style="list-style-type: none"> <li>▪ Alkyd Resins Production</li> <li>▪ Ammonium Sulfate Production--Caprolactam By-Product Plants</li> <li>▪ Maleic Anhydride Copolymers Production</li> <li>▪ Manufacture of Paints, Coatings and Adhesives</li> <li>▪ Polyester Resins Production</li> <li>▪ Polymerized Vinylidene Chloride Production</li> <li>▪ Polymethyl Methacrylate Resins Production</li> <li>▪ Polyvinyl Acetate Emulsions Production</li> <li>▪ Polyvinyl Alcohol Production</li> <li>▪ Polyvinyl Butyral Production</li> <li>▪ Benzyltrimethylammonium Chloride Production</li> <li>▪ Carbonyl Sulfide Production</li> <li>▪ Chelating Agents Production</li> <li>▪ Chlorinated Paraffins Production</li> <li>▪ Ethylidene Norbornene Production</li> <li>▪ Explosives Production</li> <li>▪ Hydrazine Production</li> <li>▪ OBPA/1,3-Diisocyanate Production</li> <li>▪ Photographic Chemicals Production</li> <li>▪ Phthalate Plasticizers Production</li> <li>▪ Rubber Chemicals Manufacturing</li> <li>▪ Symmetrical Tetrachloropyridine Production</li> </ul>	<input type="checkbox"/>	

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
▪ Quaternary Ammonium Compounds Production		
Polyvinyl Chloride and Copolymers Production	<input type="checkbox"/>	
Reinforced Plastic Composites Production	<input type="checkbox"/>	
Generic MACT Categories Carbon Black Production Spandex Production Cyanide Chemicals Manufacturing Ethylene Processes	<input type="checkbox"/>	
Mercury Cell Chlor-Alkali Plants (Formerly Chlorine Production)	<input type="checkbox"/>	
Hydrochloric Acid Production and Fumed Silica Production	<input type="checkbox"/>	
Flexible Polyurethane Foam Fabrication Operations	<input type="checkbox"/>	
Friction Materials Manufacturing	<input type="checkbox"/>	
Miscellaneous Viscose Processes	<input type="checkbox"/>	
Paint Stripping Operations	<input type="checkbox"/>	
Plywood and Composite Wood Products (formerly Plywood and Particle Board Manufacturing)	<input type="checkbox"/>	
Rubber Tire Manufacturing	<input type="checkbox"/>	
Semiconductor Manufacturing	<input type="checkbox"/>	
Wet-Formed Fiberglass Mat Production	<input type="checkbox"/>	



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

May 13, 2002

Mr. Theodore D. Kennedy  
Vice President  
Georgia Pacific Palatka Operations  
P.O. Box 919  
Palatka, FL 32178-0919

Re: 112(j) Notification Information Submittal

Dear Mr. Kennedy:

Thank you for submitting the referenced information in your letter dated May 6, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to this information submittal as a "Part 1 Application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.  
Bureau of Air Regulation